

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, Washington 98101-3140

ENFORCEMENT & COMPLIANCE ASSURANCE DIVISION

July 1, 2019

Mark Larsen
Project Coordinator
ANCHOR QEA, LLC
1119 Pacific Avenue, Suite 1600
Tacoma, Washington 98402

Re: Cow Palace Safety Debris Catch Basin Basis of Design Administrative Order on Consent ("Consent Order") Docket No. SDWA-10-2013-0080 Yakima Valley Dairies, Washington

Dear Mr. Larsen:

EPA has completed our review of:

Cow Palace Safety Debris Catch Basin Basis of Design Report 100% Design Submittal (June 25, 2019)

Pursuant to Paragraph 14 of the Consent Order, EPA hereby approves this report on the condition that they it is revised to address the following comments:

1. Drawing C-04 – Final Grading Plan.

- a. This drawing shows the slope on the bottom of the Safety Debris Catch Basin as one foot (vertical) over 160 feet (horizontal), or 1.5%. This slope may not be sufficient to induce flow to the sump because of the constricted flow space between the liners. In the absence of flow, fluid can penetrate pin-hole leaks that may be present in the lower liner. Provide documentation showing that the slope is adequate to provide for flow in the drainage layer to the sump.
- b. In Work Requirement 5, delete the word "angular" to be consistent with the Technical Specifications, which require removal of any rock over 3/8 inches whether angular or rounded.
- 2. **Figure C-09**. The location of the elbow detail is incorrect. Its location should be the elbow on the larger drawing, not a straight section of the pipe as indicted.
- 3. In some places in the report, "Safety Debris Catch Basin" is inconsistently named "Sanitary Debris Catch Basin." Correct any discrepancies.

Pursuant to Paragraph 14.b. of the Consent Order, the Cow Palace Dairy must revise this report and submit it to EPA by July 29, 2019. You may contact me at (206) 553-6904, or your legal counsel may contact Jennifer MacDonald at (206) 553-8311, if you have any questions regarding this letter.

Sincerely,

Eric Winiecki

EPA Project Coordinator

Enforcement and Compliance Assurance Division

cc: Jennifer MacDonald Rene Fuentes